

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

May 26, 2021

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

In connection with Plaintiffs' efforts to secure the testimony of Alp Karli, we have consulted with our local counsel in Turkey. Based on our discussions, we understand that we may need Turkish attorneys to appear when Mr. Karli's testimony is taken and that to do so before a Turkish tribunal they will need notarized and apostilled authorization to act on Plaintiffs' behalf in the form of a Power of Attorney. They have prepared the document in the form that they believe will be acceptable to the Turkish court, which I have signed and had notarized. In order to comply with the requirements of the Turkish court for the taking of evidence in Turkey pursuant to the Hague Convention, I respectfully ask that this Court have the Power of Attorney form apostilled, which we can then forward to Turkish counsel.

Because the original, notarized form contains personal identifying information and work-product information, it will be provided separately and to the Court only.

Please let me know if the Court needs any additional information.

May 26, 2021

Page 2

Respectfully submitted,

KREINDLER & KREINDLER

/s/ Megan Wolfe Benett

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For the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims

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For the MDL 1570 Plaintiffs' Exec.
Committee for Commercial Claims

MOTLEY RICE

/s/ Robert T. Haefele

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For the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims